

REMARKS/ARGUMENTS

This Amendment is provided in response to the Final Office Action dated September 16, 2004. This Amendment is being submitted within the three month period for response extending to December 16, 2004. Also, please note that this Amendment is
5 being provided with the two month period extending from the date of the Final Office Action to November 16, 2004. Please enter the following amendments and remarks.

Claim 5 is currently amended.

Claims 1-8 remain pending in this case after entry of this Amendment.

10 **Claim Objections**

The Office has objected to claim 5 as being dependent upon itself. The Applicant has amended claim 5 to properly depend from claim 4. Therefore, the Office is request to withdraw the objection to claim 5, as amended.

15 **Rejections under 35 U.S.C. § 102**

Claims 1-4 and 6-8 were rejected under 35 U.S.C. §102(e) as being anticipated by Hale et al. ("Hale") (U.S. Patent No. 6,192,418). These rejections are respectfully traversed.

Hale discloses a method for performing external procedure calls from a client
20 program to a server program, wherein the client program and the server program operate on separate processors, i.e., a client processor and server processor, but share a common memory. Additionally, the separate processors can operate under separate operating systems, i.e., a client operating system and a server operating system. According to Hale, when the client program calls a particular server program function, the client program
25 calls a proxy procedure for the particular server program function. The proxy procedure

notifies the server operating system that the particular server program function is about to be called. Then, the server operating system invokes a stub procedure to perform required parameter translation and call the particular server program function. When the particular server program function is completed, the stub procedure performs required parameter and return value translation and notifies the server operating system to return control to the client program. The client program then continues execution making use of the parameters and return values received from the particular server program function.

With respect to claims 1 and 6 of the present invention, a module interface having particular features is recited. More specifically, the module interface is required to receive a file system request configured in a first format based on a first operating system. The module interface is also required to be capable of translating the received file system request into a second file system format based on a second operating system.

Hale (particularly column 6, line 55 through column 7, line 15) does not teach or suggest file system request receipt or translation. Hale does not disclose a module interface capable of receiving a file system request based on a first file system format. Also, Hale does not disclose a module interface capable of translating the received file system request into a second format based on a second operating system. Rather, the disclosure of Hale is limited to external function calls associated with software executing on client processors and server processors. Since Hale does not teach or suggest a module interface for performing file system request receipt and translation, Hale does not teach each and every feature of claim 1 or claim 6.

For a claim to be anticipated under 35 U.S.C. §102, each and every feature of the claim must be disclosed in a single prior art reference. In view of the foregoing, the Applicant respectfully submits that each of claims 1 and 6 is not anticipated by Hale and

is patentable over the cited art of record. Therefore, the Office is respectfully requested to withdraw the rejections of claims 1 and 6.

Additionally, since each of claims 2-4 and 7-8 ultimately depends from either independent claim 1 or independent claim 6, each of claims 2-4 and 7-8 includes all features recited in its respective independent claim. Therefore, the Applicant submits that each of claims 2-4 and 7-8 is patentable over the cited art of record for at least the reasons provided for its respective independent claim.


Rejections under 35 U.S.C. § 103

10 Claim 5 was rejected under 35 U.S.C. §103(a) as being unpatentable over Hale in view of Latif et al. ("Latif") (U.S. Patent No. 6,400,730). This rejection is respectfully traversed.

 Since claim 5 depends from independent claim 6, claim 5 includes all features recited in claim 6. Therefore, the Applicant submits that claim 5 is patentable over the
15 cited art of record for at least the reasons provided for claim 6.

In view of the foregoing, the Applicant respectfully submits that each of claims 1-8 is patentable over the cited art of record. Therefore, a notice of allowance is respectfully requested. If the Examiner has any questions concerning the present amendment, the Examiner is kindly requested to contact the undersigned at (408) 749-6900 ext. 6914. If any additional fees are due in connection with filing this amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. INSTP007B). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,
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